

Javier Rodriguez

From: Betsy McKinney <BMcKinney@gmlblaw.com>
Sent: Thursday, February 29, 2024 5:03 PM
To: Javier Rodriguez; Office; Laura Smittick; Silk, Jennie; Florence Johnson; Deborah Godwin; Jarrett Spence; McMullen, Bruce; Foster, Freeman; jkp@perrygriffin.com; stephenleffler@yahoo.com; Curtis Johnson, Jr.; keenandl@aol.com; Robert Spence; Andrew Horvath; Antonio Romanucci; Bhavani Raveendran; Sarah Raisch; Sam Harton; Mirena Fontana; Amanda Marini; Kaitlyn Boelter-Eberhardt; Eva Dickey; support@smitticklaw.com
Cc: Terri Norman
Subject: RE: Regarding: Nichols, Tyre: Request for a "Meet and Confer" attendant to discovery and depositions.

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Dear Mr. Rodriguez:

On behalf of our clients Preston Hemphill and Dewayne Smith, we do not object to Plaintiff's requested allotment of up to 35 depositions. However, we would object to the depositions of our clients lasting more than 7 hours.

We can be available for our clients' depositions April 11th and 12th, however we are not available April 22nd and 23rd. At this stage we would suggest scheduling both clients for April 11th and 12th if possible.

Currently we can agree to make someone available for the April dates Plaintiff has proposed. May is a difficult month for us, however we will try to make someone available for any dates the parties may select. If a specific date for the deposition of Chief Davis has been suggested, please let us know.

Thanks,

Betsy Bartlett McKinney
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